

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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|--------------------------------------|---|-------------------------------|
| IN RE: AUTOMOTIVE PARTS | : | |
| ANTITRUST LITIGATION | : | Master File No. 12-md-02311 |
| THIS DOCUMENT RELATES TO: | : | |
| Product(s): Wire Harnesses | : | Honorable Marianne O. Battani |
| All Actions | : | Honorable Mona Majzoub |

DECLARATION OF WOLFGANG GIROD

My name is Wolfgang Girod. I am the Director of Finance and Control of S-Y Systems Technologies Europe GmbH (“S-Y Europe”). This Declaration is based upon my knowledge following reasonable inquiry.

1. S-Y Europe is a German GmbH (limited liability company) with its principal place of business in Regensburg, Germany.
2. S-Y Europe was formed in 2001 as a joint venture between Siemens Automotive AG (“Siemens”) and Yazaki Corporation, with each owning an equal share in S-Y Europe. In 2008, Continental Automotive GmbH acquired Siemens’ ownership interest. Since that time, Continental Automotive GmbH and Yazaki Corporation each have owned a 50 percent interest in S-Y Europe.
3. S-Y Europe is not, and has never been, a parent or subsidiary of Yazaki Corporation or Yazaki North America, Inc.

4. S-Y Europe is not, and has never been, a parent or subsidiary of S-Y Technologies, America, LLC.

5. S-Y Europe has never had manufacturing or sales facilities, either directly or through subsidiaries, in the United States.

6. S-Y Europe has never sold automotive wire harness systems for mass production of automobiles in the United States. Nor has it ever sold automotive wire harnesses, speed sensor wire assemblies, automotive electrical wiring, lead wire assemblies, cable bond, automotive wiring connectors, automotive wiring terminals, electronic control units, fuse boxes, relay boxes, junction blocks, high voltage wiring, and power distributors for mass production of automobiles in the United States.

7. S-Y Europe has never had any subsidiaries that conduct business in the United States.

8. S-Y Europe has never been licensed to do business in the United States.

9. S-Y Europe has never had a subsidiary located in the United States.

10. S-Y Europe has never had its principal place of business in the United States.

11. S-Y Europe has never been incorporated in the United States.

12. S-Y Europe has never had offices in the United States.

13. S-Y Europe has never owned or leased real estate in the United States.

14. S-Y Europe has neither been sued in the United States before this case, nor has it sued any entity or individual in the United States.

15. S-Y Europe has never engaged in manufacturing in the United States.

16. S-Y Europe has never maintained bank accounts or borrowed money in the United States.

17. S-Y Europe has never maintained an address, phone, or fax numbers in the United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 12, 2012



Wolfgang Girod